

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

In re

J.A.R. CONCRETE, INC.,

Debtor.

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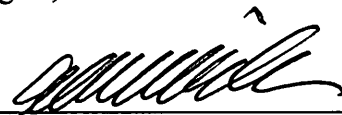
Case No. 23-30242-HCM-11

EXHIBIT AND WITNESS LISTS FOR HEARING ON
MITSUBISHI HC CAPITAL AMERICA, INC.'S MOTION FOR
RELIEF FROM THE AUTOMATIC STAY

EXHIBITS				
EXHIBIT NUMBER	DESCRIPTION	O F F E R E D	O B J E C T I O N	A D M I T T E D
1.	Motion for Relief from Stay			
2.	Response to Motion for Relief from Stay			
3.	Proof of Insurance			
4.	Resume of Sean Kelley			
5.	Photographs of the collateral			

WITNESS LIST		
Witness Number	Witness Name	Nature of Testimony
1.	SEAN KELLEY	He is a Certified Equipment Appraiser who has consulted various commercial indexes of value and researched for comparable sales online. He will give his opinions of value, based on mileage and hours.
2.	JOE A. ROSALES, JR	Principal officer of both Debtors. He is expected to testify that the equipment is in good condition, was purchased upon aggressive amortizations, is not in heavy use, and is needed for reorganization either in operations or for sale at arm's length.

Respectfully submitted this 4th day of August, 2023.

/s/ 

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Attorney for the Debtor-in-Possession

CERTIFICATE OF SERVICE

I do hereby certify that on the 4th day of August, 2023, I did cause a copy of the foregoing Exhibit and Witness Lists For Hearing on Mitsubishi HC Capital America, Inc.'s Motion for Relief from the Automatic Stay to be emailed to Mitsubishi HC Capital America, Inc., c/o Megan M. Adeyemo, madeyemo@grsm.com.

/s/ 
E.P. BUD KIRK